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FEC MAIL
OPERATIONS CENTER

2006 MAR 24 P 4: 34

Perkins
Coie

Caroline Goodson
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March 24, 2006

BY HAND DELIVERY

Mr. Lawrence H. Norton
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 5701

Dear Mr. Norton:

On behalf of Congressman Bob Filner, his wife Jane Filner, Bob Filner for Congress and Mark Pollick, in his official capacity as treasurer, we write in response to the complaint filed by Congressman Filner's opponent, Juan Vargas (the "Complaint") and subsequently labeled MUR 5701. The Complaint contains baseless allegations about the fundraising services provided by Ms. Filner through her sole proprietorship, Campaign Resources, to Bob Filner for Congress. The Complaint is without merit and should be dismissed immediately.

First, the Complaint alleges that Campaign Resources is a "phony entity" and a "sham company" that merely serves as a means of diverting campaign funds for the Filners' personal enrichment. *See* Compl. at 1. These allegations are false. As the documents attached as Exhibit A demonstrate, Ms. Filner established Campaign Resources as a sole proprietorship in 1995, the year she left her position as Executive Director of Democrats 2000. *See* Exhibit A. The Internal Revenue Service assigned Campaign Resources an Employer Identification Number (EIN), and the Government of the District of Columbia issued a Business Tax Registration Number and Certificate of Registration for the trade name "Campaign Resources." *Id.* There is simply no basis for concluding that her sole proprietorship is a "sham."

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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The complainant also falsely alleges that Ms. Filner is not entitled to the compensation she has received for her fundraising work. The Complaint provides no factual basis for concluding that the campaign's compensation to Ms. Filner through her sole proprietorship was anything other than *bona fide* compensation for services actually rendered.

The Complaint suggests, with thinly veiled sexism, that it is a per se violation of the Act for a campaign to hire the candidate's spouse. Yet this is not the law. The Act and regulations permit a candidate's campaign committee to pay the candidate's wife for services provided to the campaign. See Advisory Opinion 2001-10; 11 C.F.R. 113.1(g)(1)(i)(H). Ms. Filner is not required to be paid at a reduced rate merely because she is a spouse; she may receive the fair market value of her *bona fide* services she provides to the campaign. *Id.* The Complaint presents conduct that is legal on its face, and accordingly should be dismissed. See 11 C.F.R. 111.4(d)(3).

Moreover, there is sufficiently compelling evidence to refute the notion falsely proposed by the Complaint. As the attached documents show, since 1995 Ms. Filner has been responsible for all fundraising for Bob Filner for Congress, including mail and email solicitations, planning fundraising events at all stages, maintenance and growth of the campaign's extensive database, and keeping abreast of compliance requirements for solicitations and other aspects of fundraising on behalf of federal officeholders and candidates. Over the past decade, Ms. Filner has arranged approximately 150 events, ranging from small gatherings of less than six people to large events with 400 or more attendees. She has written and produced approximately 50 solicitation letters, the majority of which were mailed to over 3,000 households. She has also produced approximately 12 campaign newsletters. Samples of draft solicitation letters, invites, and newsletters she has prepared as part of her work for the campaign are attached as Exhibit B, and FEC reports show the contributions raised for the campaign while she has served as chief fundraiser. There is no reasonable basis for concluding she did not perform *bona fide* services for the campaign; again, the facts amply refute this false premise.

Nor is there any reason to believe that the campaign's payments for the work performed by Ms. Filner have been in excess of fair market value. A copy of Campaign Resources' initial contract with the campaign and a competing bid for the campaign's work are attached as Exhibit C. The campaign's records indicate that Campaign Resources' annual compensation has never exceeded \$60,000, and in some cases has been as low as approximately half that amount. The campaign is not aware of any facts that would suggest the compensation to Campaign Resources was not at fair market value.

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It is ironic that the complainant is running against Congressman Filner and would question why an incumbent needs a full-time fundraiser in the first place. By filing this spurious Complaint, he provides an example of the very reason why incumbents need to be prepared with resources to fight back against attacks, no matter how groundless, from would-be challengers.

The conclusory allegations set forth in the complaint are baseless and do not meet the standard for further Commission consideration. Purely speculative charges do not form an adequate basis to find reason to believe that a violation has occurred.¹ Moreover, these charges are refuted by the evidence provided. For these reasons, the Commission should immediately dismiss the complaint.

Very truly yours,



Caroline Goodson

Brian G. Svoboda

Counsel to Representative Filner, Jane Filner,
Bob Filner for Congress and Mark Pollick,
in his official capacity as Treasurer

¹ Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons, MUR 4960.

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EXHIBIT A

26044150079

2828 Wisconsin Avenue NW #311 (202)237-2335 phone
Washington, DC 20007 (202)237-1188 fax
janefilner@aol.com

Jane Merrill Filner

SUMMARY OF QUALIFICATIONS

- Experienced manager of multiple, simultaneous, multi-task projects.
- Excellent organizational skills and keen attention to detail.
- Goal-oriented team player and highly capable of working independently.
- Planned and coordinated countless conferences, workshops and events.
- Developed programs for and worked with high school and college age people.
- Strong communication skills.
- Ability to work effectively under pressure, with start-up offices and changing conditions.

PROFESSIONAL EXPERIENCE

- 1995-Present Campaign Resources Washington, DC & San Diego, CA
President, sole proprietorship
- Developed and implemented fundraising plan for three Congressional re-election campaigns that included events in DC and CA, and direct mail.
 - Coordinated all fundraising events, ranging in size from 5-500 guests.
 - Supervised fundraising staff and volunteers.
 - Wrote all direct mail solicitations.
 - Maintained campaign database and financial records. Prepared all required federal and state reports.
- 1993-95 Democrats 2000 Washington, DC
Executive Director
- Managed national political organization. Developed and executed programs, administered office and directed all fundraising efforts.
 - Arranged "Summer Speaker Series" for Capitol Hill interns – speakers included Vice-President Gore, White House Chief of Staff, U.S. Senators and Congress members.
 - Organized campaign training workshops for student interns interested in working or volunteering for Congressional campaigns.
 - Performed all functions with the help of small staff, consultants, and student volunteers.
 - Communicated with and reported to board of directors and advisory committee.
 - Established organization's first direct mail solicitation program resulting in a stable base of income.
 - Conceptualized and coordinated annual fundraising dinners.

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PROFESSIONAL EXPERIENCE, continued

Jane Merrill Filner, page 2 of 2

- 1984 – 1992 Local Agency Formation Commission San Diego, CA
Executive Officer
- Developed policy for review by commission of 13 local elected officials.
 - Recruited, hired, supervised and evaluated nine-member staff and consultants.
 - Analyzed proposals from cities, special service districts and property owners and recommended commission action
 - Significantly reduced application-processing time, thereby saving property developer's money.
 - Arranged statewide legislative workshops.
- 1979 – 1984 Local Agency Formation Commission San Diego, CA
Staff Analyst
- Organized and staffed advisory committees composed of local government officials and community members.
 - Analyzed ability of three unincorporated communities to incorporate as cities. Processed their applications and wrote reports for communities to consider before they voted on incorporation.
 - Presented incorporation and service district formation reports at public forums.
 - Represented LAFCO before local government agencies.

EDUCATION

- 1984, MPA, Public Administration San Diego State University, CA
- 1978, BA, Political Science San Jose State University, CA

COMPUTER SKILLS

- Proficient in Word, Excel, Internet research and database systems.

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CampaignResources

Jane Merrill Filner
Principal

2828 Wisconsin Avenue NW - Suite 311
Washington, DC 20007

Phone 202.237.2335
Fax 202.237.1188

 20
CampaignResources Co

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
PHILADELPHIA PA 19102

DATE OF THIS NOTICE: 12-01-95
NUMBER OF THIS NOTICE: CP 575 A
EMPLOYER IDENTIFICATION NUMBER: 52-1949833
FORM: SS-4
2820224496 B

JANE MERRILL FILNER
CAMPAIGN RESOURCES
408 C ST NE
WASHINGTON DC 20002

FOR ASSISTANCE CALL US AT:
410-962-2590 LOCAL BALTIMORE
1-800-829-1040 OTHER MD/DC

OR WRITE TO THE ADDRESS
SHOWN AT THE TOP LEFT.

IF YOU WRITE, ATTACH THE
STUB OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER (EIN)

Thank you for your Form SS-4, Application for Employer Identification Number (EIN). We assigned you EIN 52-1949833. This EIN will identify your business account, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

Use your complete name and EIN shown above on all federal tax forms, payments, and related correspondence. If you use any variation in your name or EIN, it may cause a delay in processing, incorrect information in your account, or cause you to be assigned more than one EIN.

If you're required to deposit for employment taxes (Forms 941, 943, 940, 945, CT-1, or 1042), excise taxes (Form 720), or income taxes (Form 1120), we will send an initial supply of Federal Tax Deposit (FTD) coupon books within five to six weeks. You can use the enclosed coupons if you need to make a deposit before you receive your supply.

Based on the information shown on your Form SS-4, you must file the following forms(s) by the date we show.

Form 941
Form 940

11/28/95
01/31/96

If the due date has passed please complete the form and send it to us by 12-18-95. If we don't receive the form by that date additional penalties and interest will be charged. If you weren't in business or didn't hire employees for the tax period shown, please file the form showing that you have no liability.

If you need help in determining what your tax year is, you can get Publication 538, Accounting Periods and Methods, at your local IRS office.

If you have any questions about the forms shown or the date they are due, you may call us at 1-800-829-1040 or write to us at the address shown above.

Thank you for your cooperation.

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GOVERNMENT OF THE DISTRICT OF COLUMBIA



DEPARTMENT
OF FINANCE AND REVENUE

FILNER JANE MERRILL
CAMPAIGN RESOURCES
408 C STREET NE
WASHINGTON

DC 20002

REPLY TO:
TAXPAYER ASSISTANCE DIVISION
BUSINESS TAX REGISTRATION SECTION
P.O. BOX 470
WASHINGTON, D.C. 20044

03/09/95

D.C. Business Tax
Registration No.

0196793 000

You have been registered for the taxes checked below. Your filing basis has been determined as shown. It is important that the above registration number be used on all correspondence and tax returns.

Monthly Annually

_____ Sales and Use Tax

_____ Use Tax (only)

_____ Employer's Withholding

_____ Hotel Occupancy Tax

_____ Corporation Franchise

Tax Year Ends _____

_____ Unincorporated Business Franchise

Tax Year Ends _____

☒ Personal Property Tax

Tax Year Ends FY June

_____ *Unemployment Compensation Tax

Any tax returns currently due are enclosed with this notice. Tax returns that are due in the future will be separately mailed to you prior to the due date. If you have tax returns that are delinquent, you will be notified by the Department of Finance and Revenue.

*If applicable, you will also be registered for Unemployment Compensation Taxes and will be contacted by the Office of Unemployment Compensation regarding your filing requirements. Any questions concerning your liability for Unemployment Compensation may be answered by calling (202) 639-1383.

A Declaration of Estimated Franchise Tax (Form D-2030ES) must be filed by every corporation and unincorporated business whose franchise tax may reasonably be expected to exceed \$1,000 for the taxable year.

<p>① Federal Employer's Identification Number (See Instructions) N/A</p> <p>□ □ □ □ □ □ □ □ □ □</p>	<p>② Business Code (See Instructions)</p> <p>④ Principal business activity consulting</p> <p>⑤ Principal product or service fundraising</p> <p>⑥ Business code number 7392</p>																
<p>③ Legal Form of Business (check one)</p> <p><input checked="" type="checkbox"/> Sole Proprietor <input type="checkbox"/> Corporation</p> <p><input type="checkbox"/> General Partnership <input type="checkbox"/> S Corporation</p> <p><input type="checkbox"/> Limited Partnership <input type="checkbox"/> Other (Specify)</p> <p><input type="checkbox"/> Joint Venture</p> <p><input type="checkbox"/> Government Agency</p>																	
<p>④ If incorporated, enter State: N/A Date:</p>																	
<p>⑤ Business Name (Individual, Partnership or Corporate Name) CAMPAIN RESOURCES</p>																	
<p>⑥ Trade Name (If different from line 5)</p>																	
<p>⑦ Business Address (P.O. Box not acceptable unless located in a Rural Area)</p> <p>403 E ST NE</p> <p>WASHINGTON DC 20002</p>																	
<p>⑧ Local Business Phone Number (area code) (602) 543-1155</p>	<p>⑨ Main Office/Home Phone No. (area code) (602) 791-8654</p>																
<p>⑩ Date when business started (Month-Day-Year) 1/5/98</p>																	
<p>11 Are you purchasing this business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If answer is "No," check and/or explain below:</p> <p><input checked="" type="checkbox"/> New Business</p> <p><input type="checkbox"/> Business recently incorporated</p> <p><input type="checkbox"/> Name Change (Provide a copy of amendment to Corporate Articles)</p> <p><input type="checkbox"/> Merger (Provide copy of merger agreement)</p> <p><input type="checkbox"/> Purchasing one or more locations of existing business (Not even business)</p> <p><input type="checkbox"/> Other (Specify)</p>																	
<p>12 If you are currently registered, give your D.C. Registration Number N/A</p>	<p>13 If previously registered, give your former entity name and address N/A</p>																
<p>14 Name(s) of former owner(s), or Corporate Name N/A</p>	<p>15 If previously registered, give your former entity name and address N/A</p>																
<p>16 Registration Number of former owner(s), if available N/A</p>	<p>17 If your business has obtained, or has applied for, an Active Business License, enter date N/A</p>																
<p>18 NAME, TITLE, HOME ADDRESS, SOCIAL SECURITY NUMBER OF PROPRIETOR, PARTNER OR PRINCIPAL OFFICER</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:45%;">Name and Title JANE MERRILL FOLNER, PRINCIPAL</td> <td style="width:35%;">Address 3133 CONNELL ST. AVE. # 303</td> <td style="width:20%;">ZIP Code WASHINGTON DC 20008</td> <td style="width:20%;">Social Security 506-06-8161</td> </tr> <tr> <td>Name and Title</td> <td>Address</td> <td>ZIP Code</td> <td>Social Security</td> </tr> <tr> <td>Name and Title</td> <td>Address</td> <td>ZIP Code</td> <td>Social Security</td> </tr> <tr> <td>Name and Title</td> <td>Address</td> <td>ZIP Code</td> <td>Social Security</td> </tr> </table>		Name and Title JANE MERRILL FOLNER, PRINCIPAL	Address 3133 CONNELL ST. AVE. # 303	ZIP Code WASHINGTON DC 20008	Social Security 506-06-8161	Name and Title	Address	ZIP Code	Social Security	Name and Title	Address	ZIP Code	Social Security	Name and Title	Address	ZIP Code	Social Security
Name and Title JANE MERRILL FOLNER, PRINCIPAL	Address 3133 CONNELL ST. AVE. # 303	ZIP Code WASHINGTON DC 20008	Social Security 506-06-8161														
Name and Title	Address	ZIP Code	Social Security														
Name and Title	Address	ZIP Code	Social Security														
Name and Title	Address	ZIP Code	Social Security														

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PART II FRANCHISE TAX REGISTRATION

19. Indicate your profession, principal business activity or service (for example, retail grocery, wholesale auto parts, barber shop, etc.) Fundraising Consulting
20. Do you or will you have an office, warehouse, or other place of business in D.C., or a representative with a District of Columbia location? ☒ Yes ☐ No
21. Do you or will you have merchandise stored in a public or private warehouse in D.C.? ☐ Yes ☐ No
22. Do you or will you perform personal services (medical, accounting, consulting) or work in D.C., such as electrical, heating, construction, etc., or are you making installations or repairs of any type in D.C.? ☐ Yes ☐ No
23. Do you or will you have rental property in D.C.? ☐ Yes ☐ No
- (a) If Yes, date property acquired _____
- (b) Date converted to rental property _____
24. Do you or will you derive any business related income from D.C. sources? ☐ Yes ☐ No
25. Date your taxable year ends: Month Dec and day 31

26. Describe fully ALL your current or expected business activities within D.C. I will be performing consulting services related to campaign fundraising

PART III EMPLOYER'S D.C. WITHHOLDING TAX REGISTRATION

27. Estimated total number of employees N/A
28. If you are applying for Employer's D.C. withholding tax registration, give the date you first acquired D.C. resident employees N/A
29. Number of D.C. resident employees subject to D.C. withholding tax N/A
30. Estimated amount to be withheld monthly for D.C. resident employees N/A
31. Location of Payroll Service N/A

PART IV SALES AND USE TAX REGISTRATION

32. Check applicable block(s) below:
- ☐ Reporting sales tax on retail sales or rentals
- ☐ Reporting use tax on items purchased tax free outside D.C.
- ☐ Purchasing in D.C. items for resale outside of D.C. (Attach photocopy of State/County Sales Tax Registration.)
- ☐ Purchasing in D.C. cigarettes for resale outside of D.C. (Attach photocopy of State/County cigarette/tobacco license.)
- ☒ Making no taxable sales and tax is paid to vendors on all taxable purchases
- ☐ Making exempt sales where a certificate of resale is issued
33. Do you sell in D.C. N/A

34. Indicate number of places of business in D.C. 1 and list below the complete location address of each:
- 404 C ST NE, WASHINGTON DC 20002

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PART IV SALES AND USE TAX REGISTRATION (Continued)

35(a). If you have more than one place of business making taxable sales in the District of Columbia, do you wish to file a Consolidated Sales Tax return for all locations? N/A

☐ Yes ☒ No

(b). If yes, business address where the Consolidated sales tax return should be sent:

Street

City

State

Zip Code

PART V HOTEL OCCUPANCY TAX REGISTRATION

36. Are you engaged in the rental of rooms or suite of rooms?

☐ Yes ☒ No

37. How many rooms are available for rent?

38. How many rooms are rented to permanent residents?

NOTE: Permanent residents are defined as persons who have occupied a room for ninety (90) consecutive days or more. Occupancy for the first eighty-nine (89) days is taxable.

PART VI PERSONAL PROPERTY TAX REGISTRATION

39. Give total amount of insurance coverage on tangible personal property.

N/A

40. List all District of Columbia addresses where tangible personal property (owned by you) is located, and describe property at each location.

408 C ST. NE WASHINGTON DC 20002

Property - phone, office supplies

I declare under penalties as provided by law that this application (including accompanying schedules and statements) has been examined by me and to the best of my knowledge and belief is a true, correct, and complete application.

James W. Fink
Signature

Principal
Title

2/6/93
Date

COMPLETED APPLICATIONS MUST BE SIGNED BY EITHER OWNER, PARTNER OR PRINCIPAL OFFICER OF CORPORATION, OR AGENT. (Power of Attorney must be attached)

Additional Remarks

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THIS COLUMN FOR OFFICIAL USE ONLY			
Type Test	Lat Begin	Cycle	Method
H			
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Reviewed Date			
Date Data Entered/Issued			
Pending		Issued	

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PART VII UNEMPLOYMENT COMPENSATION REGISTRATION (Continued)

THIS PART MUST BE COMPLETED IF ANY OF YOUR EMPLOYEES WORK IN THE DISTRICT OF COLUMBIA

12. Date first wages paid in D.C. 13. Number of workers employed in D.C. (including officers)

14. List previously assigned unemployment insurance no. (if any) 15. Estimated gross payroll: per month or per quarter

16. Name, Title, Home Address, Social Security Number of Owner, Officer, or Agent responsible for reporting and remitting Unemployment Taxes

Name Title Social Security Number

Street Address

City State Zip Code

17. Filing preferred for more than one business establishment (check one)
☐ Separate Return for each location ☐ Consolidated Return for all locations

18. List all places of business in D.C.

BUSINESS NAME	LOCATION ADDRESS	CITY, STATE, ZIP CODE

19. Are you purchasing this business? ☐ Yes ☒ No
 If yes, please list predecessor information (name, address, previous number, etc.)

Name:

Address:

D.C. ID number of former owner:

20. Did you acquire the entire business of your predecessor? ☐ Yes ☒ No

21. If you purchased part of the business, state approximate percentage of Business or Payroll acquired (see instructions for computing percentages)

22. For each state in which you have a business, check the box in which you are required to file a return (see instructions for computing percentages)

THE FOLLOWING TO BE COMPLETED BY NON-PROFIT ORGANIZATION ONLY

23. Are you covered by the Federal Unemployment Tax Act (FUTA)? ☐ Yes ☒ No

24. Are you a corporation, partnership, or other entity subject to the Federal Unemployment Tax Act (FUTA)? ☐ Yes ☒ No

25. (SEE INSTRUCTIONS TO FEDERAL UNEMPLOYMENT INSURANCE CHANGES FOR INSTRUCTIONS) ☐ Corporation ☒ Non-profit organization

I declare under penalties as provided by law that PART VII (including accompanying schedules and statements) has been examined by me to the best of my knowledge and belief is true, correct, and complete.

Signature Title Date
Josephine Flores *Principal* *2/6/95*

COMPLETED PART VII MUST BE SIGNED BY EITHER OWNER, PARTNER OR PRINCIPAL OFFICER OF CORPORATION, OR AGENT. (Power of attorney must be attached)

PART VII UNEMPLOYMENT COMPENSATION REGISTRATION

IMPORTANT—ALTHOUGH THERE IS DUPLICATION OF SOME INFORMATION REQUESTED IN THIS PART THAT HAS BEEN PREVIOUSLY REQUESTED IN PART I, PART VII UNEMPLOYMENT COMPENSATION REGISTRATION MUST BE COMPLETED IN ITS ENTIRETY BY ALL APPLICANTS. PART VII WILL BE PROCESSED SEPARATELY FROM THE REST OF THE REGISTRATION FORM (PARTS I THROUGH VI).

1. Federal Employer's Identification Number
(See Instructions)

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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2. Business Code (see Instructions)

A. Principal business activity

B. Principal product or service

C. Business code number

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

3. Legal Form of Business (check one)

- | | |
|---|--|
| <input type="checkbox"/> Sole Proprietor | <input type="checkbox"/> Corporation |
| <input type="checkbox"/> Partnership | <input type="checkbox"/> S Corporation |
| <input checked="" type="checkbox"/> Joint Venture | <input type="checkbox"/> Other (Specify) _____ |
| <input checked="" type="checkbox"/> Government Agency | |

4. If incorporated, enter

State:

Date:

5. Entry Name (Individual, Partnership or Corporate Name)

6. Trade Name (If different from line 5)

7. Entry Address (D.C. business location, if any)

8. Mailing Address to which ALL returns will be mailed

9. Local Business Phone No.
(Area Code)

10. Main Office/Home Phone No.
(Area Code)

11. NAME, TITLE, HOME ADDRESS, SOCIAL SECURITY NUMBER OF PROPRIETOR, PARTNERS OR PRINCIPAL OFFICERS

Name and Title	Address	ZIP Code	Social Security Number
Name and Title	Address	ZIP Code	Social Security Number
Name and Title	Address	ZIP Code	Social Security Number
Name and Title	Address	ZIP Code	Social Security Number

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**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS**

Business License Center - Room 1100
941 North Capitol Street, N.E.
Washington, D.C. 20002

Unique Business ID#56606XXX-114473

CERTIFICATE of REGISTRATION

THIS IS TO CERTIFY that all applicable Trade Name requirements of the Omnibus Regulatory Reform Act of 1998 have been complied with and, this **CERTIFICATE OF REGISTRATION** is hereby issued to:

JANE MERRILL FILNER

Trade Name: CAMPAIGN RESOURCES

As of December 12, 2005

Patricia J. Ganavan, Psy.D.
Director

26044150091

EXHIBIT B

26044150092

October 7, 2003

XXX
XXX
XXX

Dear XXX:

I am writing to let my friends and supporters know that I am running for re-election to Congress in 2004 -- and to ask for your help.

California has the earliest primary in the nation -- on March 2nd. Anyone who intends to challenge me must file paperwork as a candidate this December. At this point, I do not know what kind of race I will face.

Frankly, I have very little cash with which to begin my campaign. Last year, I had to spend a lot of money to reach the thousands of voters who were new to me. (My district was drastically changed after the census and subsequent re-drawing of Congressional district boundaries.) Introducing myself and persuading them to vote for me required many expenses: stationary, postage, signs, office rent, and radio and television advertising.

Thanks to people like you, I had what I needed to run a winning campaign. I am proud to say that a majority of my new voting constituents voted for me. I am grateful to all who assisted.

Now I begin campaigning again and do not have a "war chest" to get started. I am turning to you for your personal support. You have contributed to my campaign in the past and I ask that you do so again. I need your personal backing now to get my 2004 campaign off to a strong start!

Electoral politics has changed a great deal and is no longer as predictable as it has been -- especially in California! I don't take anything for granted when it comes to my re-election. I will plan for the worst and hope for the best.

It is unfortunate that campaigning costs so much these days. It is hard for me to ask for contributions and there are many other things I could be working on than fundraising. But to remain in Congress, I have to run a successful campaign and that means asking my friends and supporters to help finance it.

I am now "California's Border Congressman." I represent the entire California/Mexico border from San Diego to Yuma, Arizona! It is a large and diverse district and I must work harder than ever to stay on top of the issues and challenges of the 51st district.

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(B)

The most important issue for all of my constituents is the lack of jobs, particularly those paying livable wages. I cannot let up on working with others to attract new or expand existing businesses in the border area.

The Imperial Valley -- added to my district last year -- is one of the world's leading agricultural centers. However, the unemployment rate usually hovers around 30% and opportunities for young people are few. Many of the residents, including the children, suffer from debilitating health problems caused by hazardous environmental conditions. They lack healthcare insurance and healthcare facilities are few. I am working hard on all these issues!

Some of the recent positions I have taken have been controversial with my constituents. I was out-spoken against the war in Iraq and voted against it. I felt our going to war with so little support from the international community would make us more vulnerable to terrorism, not less!

I also voted against the \$87 billion supplemental Iraq appropriation. Congress must hold the President accountable and condition further funding of military occupation and reconstruction on a real plan to internationalize the effort and to return the country to the Iraqis.

Another of my top priorities is keeping our promises to our nation's military veterans. While our brave young men and women are sent in massive numbers to Iraq and elsewhere to serve our country -- they return home to find that the Administration has quietly moved to reduce benefits to veterans and their families!

My senior position on the Veterans Committee gives me a platform upon which to call attention to and organize against the reduction of healthcare and other veterans benefits.

As you might guess in my very multi-ethnic district, we are disproportionately affected by the civil rights abuses ordered by Attorney General Ashcroft in the name of "security." Legitimate border crossing has been discouraged; those that look "foreign" are harassed and intimidated; legal residents sit in jail without formal charges lodged against them. If we lose our freedoms, the terrorists will have won!

I have touched on only several of the matters I work on in Congress but I wanted to give you a feel for what matters most to me. I feel my role is to work on behalf of our nation's working people -- to see that they are treated fairly by "the system" -- and that they have access to the opportunities we all value as Americans.

One way I do that is teaching people how to exert their power as individuals and organize with others to reach a common goal. I began that effort as a School Board member and continued it as a City Councilman and now Congressman.

I hope you feel I have earned your support to continue in Congress. You can help by sending a personal check for my re-election campaign.

The contribution limits have changed and my campaign can accept up to \$2000 per person (or \$4000 per couple) for each of the primary and general elections. You may also use your VISA or MasterCard to make a contribution by filling out the information required on the enclosed envelope.

If you have any questions, please call me directly in Washington, DC, at (202) 237-2335 or in San Diego at (619) 425-1998.

I would appreciate your support. Thank you.

Sincerely,

BOB FILNER
Member of Congress

Enclosure

P.S. I must begin my re-election campaign immediately! Please mail your check today.

26044150095

Celebrating 20[☆] years!

Please join us at a luncheon to honor
Congressman Bob Filner's 20 years
of public service to our community
and to support his 2000 re-election.

Special Guest
Congresswoman Nancy Pelosi

Friday, October 13, 2000

Private Reception: 11:30 a.m.

Luncheon: 12:00 noon

(Registration opens at 11:30 a.m.)

Holiday Inn on the Bay
1355 North Harbor Drive, San Diego
For more information: (619) 425-1998 or (202) 789-5477

Reply card enclosed, Reservation deadline: October 6

Celebrating 20 years! A Luncheon to Honor Congressman Bob Filner.

☐ Yes, I want to attend Congressman Filner's Luncheon on October 13, 2000.

☐ I want to reserve ___ Friend level tickets at \$125 each.

☐ I want to reserve ___ Sponsor level tickets at \$250 each.
Includes preferred seating at Luncheon and Private Reception.

☐ Sign me up as Co-Chair for \$1,250.
Includes Luncheon for 10 and Private Reception for 2.

☐ Sign me up as Chair for \$2,500.
Includes preferred seating at Luncheon for 10, Private Reception for 4,
and special recognition at Luncheon.

☐ No, I cannot attend, but I would like to make a contribution to Congressman Filner's re-election campaign.

Enclosed is my check for \$_____. Please make all checks payable to: Bob Filner for Congress.

Please bill my: ☐ Visa ☐ Mastercard Card Number_____

Signature:_____ Expiration Date:_____

Federal law requires our committee to report full name, mailing address, occupation and name of employer for each individual whose contributions aggregate more than \$200 per year.

Name_____ Occupation_____

Employer_____ Office phone ()_____

Home phone ()_____ Mailing address_____

City_____ State_____ Zip_____

Federal law permits us to accept personal contributions up to \$1000 per individual and \$5000 per qualified federal PAC for General Election. Contributions to Bob Filner for Congress are not tax deductible.

The following will attend the Luncheon:

1)_____ 2)_____ 3)_____

4)_____ 5)_____ 6)_____

7)_____ 8)_____ 9)_____

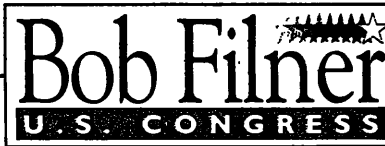
10)_____

The following will attend the Private Reception: 1)_____

2)_____ 3)_____ 4)_____

Bob Filner for Congress • P.O. Box 127868 • San Diego, CA 92112

26044150097



September 27, 1999

The Honorable Bill Richardson
Secretary of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Bill:

I understand that you will be in San Diego on November 12, 1999, to address the Forum Fronterizo. If your schedule permits, I would be very grateful if you would also appear at a campaign fundraising event for me. I do not yet know who will be running against me for re-election in 2000, but I'm working to raise the cash to be ready for whatever kind of campaign I will need to run. Your help would be greatly appreciated.

Please let me know as soon as possible if an event for me can be added to your schedule. My wife, Jane, would be coordinating any fundraising event we could arrange. Her number is (202) 789-5477. Thanks, Bill!

Sincerely,

A handwritten signature in black ink, appearing to read "Bob", written over the printed name.

BOB FILNER
Member of Congress

26044150098



Congressman Bob Filner

50th District — California

October 26, 1999

Ramon Bosquez
World Duty Free
63 Copps Hill Road
Ridgefield, CT 06877

Dear Ramon:

I would like to invite you to meet the **Honorable Bill Richardson** at a private lunch in San Diego on Friday, November 12, 1999.

If you don't already know my former Congressional colleague, this will be an excellent opportunity to become acquainted with him -- the guests will number an intimate 15. I got to know Bill when we served together in the House of Representatives. He's had a fascinating career. Given all that's on his plate, I am very honored that he is taking the time to help me with my re-election campaign. Our lunch will be an early one to accommodate his schedule.

The lunch with Bill Richardson will benefit my 2000 re-election campaign. The candidate filing deadline is a couple of months away, but at this time, it looks like I will have one or more opponents. I am working hard to be ready for whatever kind of campaign I may be facing. I hope you can help. The details for the event are:

Date: Friday, November 12, 1999
Time: 11:00 a.m.
Location: The home of Darlyn and Chuck Davenport
815 Armada Terrace, Point Loma
Directions: see attached

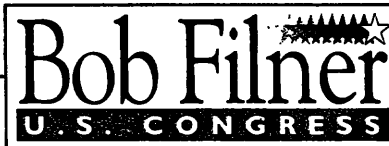
Please respond by faxing back the attached reply form before November 5th. If you have any questions, please call me or my wife, Jane, who is coordinating the event. Our phone number is (202) 789-5477 and our fax is (202) 789-5479.

I hope you will join us for what I know will be a very interesting discussion. Thank you.

Sincerely,

BOB FILNER
Member of Congress

Enclosures



faxed 11/9 5:15pm

FAX

DATE: 11/9/99

TO: LeeAnn Inadomi
Office of the Secretary
Department of Energy
(202) 586-6210 phone
(202) 586-7644 fax

FROM: Jane Filner
(619) 425-1998 phone
(619) 425-1986 fax

RE: Attendance List for Filner Event

PAGES: 1

Here are names and affiliations of the people who are attending our lunch on November 12 with the Secretary.

Rep. Bob Filner
Jane Filner
Chuck Davenport, Seawest, founder and owner
Darlyn Davenport, Seawest, founder and owner
Jan Paulin, Seawest, President and CEO
Gary Dodak, Seawest, Chief Operating Officer
Steve Thompson, Seawest, Sr VP, Operations & Administration
Phillip Di Virgillo, Seawest, Sr VP, Business Development
Jeff Marks, Seawest, Sr VP, Development
Fernando de Necochea, Southern CA Edison, Public Affairs
Richard Bloch, Pinon Farms, President
Jay Killeen, SAIC, Sr VP, Govt Affairs
Enrique Landa, border infrastructure entrepreneur
Michael Aguirre, attorney
Lowell Blankfort, publisher
Bob Balthazar, JRB Consulting
Robert Rankin, National Mitigation Services, President
Rodney Henderson, National Mitigation Services
Linden Blue, General Atomics, Vice Chairman
Robert Will, Metropolitan Water District, attorney
Niels Ryder, M&N Windpower Limited, President

26044150100

Display cannot span more than one

facsimiletransmit

To: Jane**Fax:** 425-1986**From:** Darlyn**Date:** 11/09/99

:

Re: Nov. 12 event**Pages:** 1**CC:**☐ Urgent☐ For Review☐ Please Comment☐ Please Reply☐ Please Recycle

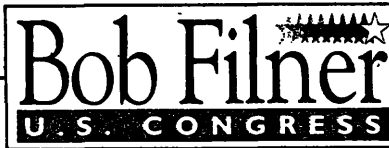
Following is a list of "for sures". I am still waiting to hear from Jan Paulin on a few. Depending on how many people you have, I can probably get our list up to 10. I really would rather not go for over 20 unless necessary.

I will be in a meeting at SeaWest from 2:00 to 3:00 today and will call you as soon as I am finished.

- Chuck Davenport - SeaWest founder and owner
- Darlyn Davenport - same as above
- Jan Paulin - President and CEO
- Gary Dodak - Chief operating officer
- Steve Thompson - Sr. V.P. Operations/Administration
- Phillip Di Virgillo - Sr. V.P. Business Development
- Jeff Marks - Executive V.P. Development

POLYMERIZATION

26044150101



FAILED

FAX

DATE: 10/20/99

TO: Darlyn Davenport
(619) 293-3347 fax

FROM: Jane Filner
(202) 789-5477 phone
(202) 789-5479 fax

RE: Proposal from Contemporary Catering

PAGES: 1

Here are my questions/comments on the proposal from Contemporary Catering.

Although the pumpkin soup sounds delicious, I would like to avoid a first course to cut down on serving and clearing distractions. I'd like to do an entree and dessert only. I like the idea of a smoked chicken salad but don't like the raspberry dressing -- seems too feminine for our group of mostly guys. Is there a Southwest style chicken salad? Can we do a Southwest chicken salad with maybe cornbread and focaccia? Instead of eggnog cake, I'd prefer something more traditional -- something chocolate or even pie (apple? pumpkin?).

When people arrive, I think we should offer a beverage. Does the labor include someone to pass beverages? Ice tea, lemonade, and soda (coke).

That's all for now. I have no problem working directly with the caterer on this -- let me know what you prefer. You mentioned you were getting one or two other proposals -- I'd like to see those when you get them. We have to pay a portion of Richardson's travel expenses (airfare, driver's time, etc), so I'm anxious to keep our total expenses down as much as possible.

I've given the invitation for the Senior Community Center benefit to Bob's scheduler in San Diego. When we figure out the November schedule, we'll be in touch about Bob attending.

Thanks, Darlyn!

26044150102

SEAWEST1455 FRAZEE ROAD
NINTH FLOOR
SAN DIEGO, CA 92108-4310
TEL (619) 293-3340
FAX (619) 293-3347

FACSIMILE COVER SHEET

Date: 10-19-99Time: 1:30To: Jane TurnerFax #: 202-789-5479

CC: _____

Company: _____

From: DarlenePages: 4 (Including cover sheet)Message: Feel free to suggest any changes.

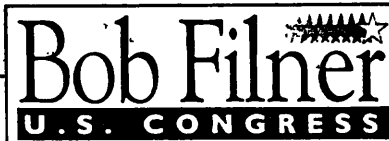
Originals will _____ will not _____ follow via:

____ U.S. Mail ____ Overnight Service ____ Other

If there are any problems with the transmission, please call the operator at (619) 293-3340 ext.0

I:\SANDRA\WPDOC\1999\FAX.WPD

26044150103



August 30, 1996

Dear

Joe -

I would like to enlist your help with a very special event. CONGRESSMAN JESSE JACKSON, JR. from Illinois will be in San Diego to campaign for me on Saturday, October 12, 1996. Although he was elected only a few months ago, he is already making a mark in the Congress.

Congressman Jackson will be our special guest at a "House" Party at the home of William Jones and his wife, Cheryl Sueing-Jones. Proceeds from the event will help my re-election campaign.

A private reception with Congressman Jackson will be held from 5:30 to 6:15 p.m. followed by the House Party from 6:00 to 7:30 p.m. The requested contribution to attend both the private reception and House Party will be \$125; it will be \$50 for the House Party only.

I am putting together a host committee of my closest supporters for this event and would like you to serve on it. I am asking host committee members to purchase at least one ticket (\$125) to attend both events. I am also asking host committee members to sell two \$50 tickets to the House Party.

I want to include your name as a member of the host committee on the printed invitation that will be mailed soon -- so I will need to hear from you by Wednesday, September 11, 1996. Please respond by completing the enclosed form and faxing or mailing it to my office as soon as possible.

I will be phoning you soon to follow up this letter and answer any questions you may have. Or, feel free to call me at the campaign office at (619) 479-1996. You may also speak with my wife, Jane, who is coordinating this event.

I need your help to win on November 5th -- I hope I can count on you to help make our event a wonderful success! Thank you, and I look forward to hearing from you!

Sincerely,

A large, stylized handwritten signature of Bob Filner in dark ink.

BOB FILNER
Member of Congress

3/4

26044150104



FRIENDS OF

FILNER

Bob Filner for Congress • P.O. Box 127868 • San Diego • California 92112 • 619-425-1998

26044150105

Transportation Is At the Top of the Agenda

Transportation and infrastructure development are critical to the long-term success and viability of the San Diego area. Congressman Filner has been moving forward on an aggressive agenda to ensure that our area has the transportation resources and infrastructure we need to be competitive in the global marketplace of the 21st century.

Of particular concern has been the reauthorization of the Intermodal Surface Transportation Efficiency Act (ISTEA). Little known or appreciated, this multibillion dollar bill is one of the most important pieces of transportation legislation that Congress will consider.

Bob serves as Co-Chair of the California ISTEA Task Force, a bipartisan working group composed of all 52 members of the California House delegation. It is working to ensure that California's unique transportation needs are fairly considered as the Congress deliberates ISTEA.

The Task Force has prepared a proposal that would give California additional funding to deal with border infrastructure, air pollution and mass transit.

Bob is also working to get funding in ISTEA for a number of unfunded San Diego area projects. The "Jobs Train," State Route 905, the Olympic Training Center access road, and border infrastructure development are all nationally significant projects that deserve increased federal funding.

"If we are going to have good jobs and a strong economy in the San Diego area in the years to come, we have to address our infrastructure and transportation needs today. That's why I'm making these issues a top priority."



Appointment to Railroad Subcommittee Will Help Congressman Filner Boost "Jobs Train"

Congressman Filner has been appointed to the Railroad Subcommittee of the House Transportation and Infrastructure Committee. The appointment to this important subcommittee reflects Bob's long-term interest in rail transportation as a way to stimulate economic growth, create jobs and improve the economic viability of our communities.

In addition to providing Bob a way to pursue these issues on the national level, the appointment puts him in a good position to promote and support the reopening of the San Diego & Arizona Eastern Railroad—the "Jobs Train"—one of Bob's highest priorities. This will provide a vital railroad line linking the Port of San Diego directly with the eastern United States, and boost employment and economic development in the San Diego area.

International Sewage Treatment Plant Opens

Congressman Filner has worked for years to overcome obstacles to new plant



On Friday, April 18, just a few days before the nation celebrated Earth Day, Congressman Filner and the people of San Diego celebrated a major environmental

achievement with the opening of the International Sewage Treatment Plant in the Tijuana River Valley.

For decades, residents in the area witnessed a river of raw

sewage flowing freely through their community and into the ocean, where it polluted beaches and caused additional environmental hazards. And no one would do anything about it. Government at all levels refused to accept responsi-

bility for the problem or move to clean up this environmental disaster.

This was intolerable and Bob has been working for a long time to get this health hazard and environmental disaster cleaned up. With the help of Citizens Revolt Against Pollution (C.R.A.P.), Bob convinced the federal government in 1991 to work with local governments to clean up the problem.

In Washington, Bob worked to get the funding needed for the new sewage treatment plant and to move construction forward. He continues to push for completion of the critical ocean outfall ahead of schedule.



Rep. Filner presents the coveted Golden Plunger Award to David Gomez, founder of Citizens Revolt Against Pollution (C.R.A.P.), at the grand opening of the long-awaited International Sewage Treatment Plant.

Chula Vista Veterans Home Ground Breaking

Good news! Ground was broken on May 17th for the long-awaited veterans home in Chula Vista. This has been a major priority for Congressman Filner, who has played a key role in making this dream a reality.

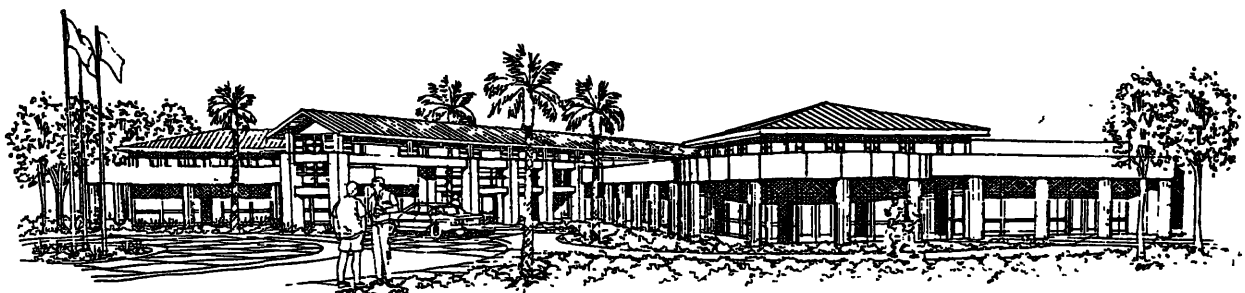
The Chula Vista project will be a 400-bed, multi-care home,

providing a wide range of services to veterans. It will be built adjacent to the Sharp Chula Vista Medical Center on a site chosen because it is close to nearby hospital facilities.

There are currently no veterans homes of this kind in southern California. The Chula Vista site will provide important and

essential services to San Diego County's 300,000 veterans, who for too long have had to do without.

With Bob's help, a commitment for \$22 million in federal funding was obtained for the Chula Vista home. The state will match this federal funding with \$12 million of its own money.



Filner Hosts Colleagues for San Diego Events

Victorious Loretta Sanchez and Hispanic Caucus Chairman Xavier Becerra appear at local events

Newly elected Congressmember Loretta Sanchez was welcomed to San Diego March 22 by Rep. Filner. In the November election, Sanchez surprised the pundits and the nation by defeating the radically extreme Bob Dornan in Orange County.



Above, Rep. Loretta Sanchez, Lowell and April Blankfort, and Rep. Filner; right, Herb King, with Bob and Rep. Sanchez

Sanchez was the special guest at a fundraiser to help retire Bob's outstanding campaign debt. More than 150 people attended the reception at the home of Dolores and Enrique Landia.

Los Angeles Congressman Xavier Becerra, the new Chairman of the Hispanic Caucus in the House of Representatives, accepted Bob's invitation to visit San Diego on April 19th to attend a fundraiser for Nick Aguilar, Trustee of the San Diego County Board of Education. Aguilar's



Board of Ed Trustee Nick Aguilar, Rep. Xavier Becerra and Rep. Filner

successful event enabled him to pay off his 1996 campaign debt.

Border Infrastructure Is Top Priority for Bob

In addition to convincing the Clinton Administration to put more resources into border infrastructure needs as part of its transportation proposals, Congressman Filner has introduced the Border Infrastructure and Safety Congestion Relief Act in Congress. This bill will direct even more resources to the effort to build, repair and enhance roads, highways, railroads, and ports along the US-Mexico border.

I believe in what Bob is trying to do and want to help him continue to provide us with real leadership. I am willing to help by:

- ☐ Volunteering time to help in his re-election campaign
- ☐ Hosting a neighborhood coffee or fundraiser.

I also understand it takes money to run a campaign. Enclosed is my contribution for Bob's re-election effort.

- ☐ Paid by personal check to "Bob Filner for Congress" \$ _____
- ☐ Please charge my: ☐ Visa ☐ Mastercard \$ _____

Card number _____ Exp. Date _____

Signature _____

Name _____

Address _____

City _____ State _____ Zip _____

Contributions to Bob Filner for Congress are not tax deductible. Federal law limits personal contributions to \$1,000 per individual, \$2,000 per couple for the Primary Election and the same amount for the General Election. Federal law requires us to report the full name, address, occupation and employer for each individual whose contributions aggregate more than \$200 in a calendar year.

Employer _____

Occupation _____

Home Phone _____

Office Phone _____

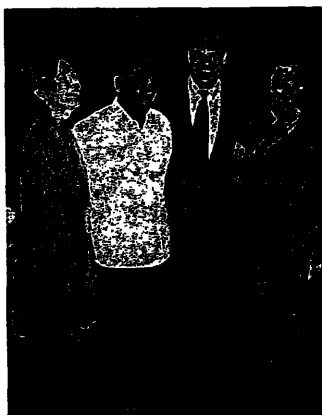
Bob Filner for Congress, P.O. Box 127868, San Diego, CA 92112

Congressman Filner Visits the Philippines

Trade and veteran rights are focus of many discussions with US and Filipino leaders.

Congressman Filner recently returned from a visit to the Philippines. Accompanied by his wife, Jane, he accepted a long-standing invitation to visit the Philippines to meet with WWII veterans and to explore opportunities in telecommunications, environmental engineering, and other trade areas in which the Philippines is interested.

The highlight of the visit was the opportunity to participate in the Bataan Day celebration and rites with Fidel Ramos, President of the Philippines. This stirring



Above, Bob and Jane Filner share a light moment with Speaker of the House Jose de Venecia, Jr., and Jenny Ilustre, Philippines Veterans Affairs Department.

ceremony commemorates the fallen war heroes who died in the infamous Bataan Death March.

Bob also met with US officials in the Philippines and their



Left, Rep. Filner greets survivors of the Bataan Death March at the Paggunta Sa Capas in Tarlac; Above, Bob is honored by Col. Emmanuel de Ocampo, Chairman of the Veterans Federation of the Philippines.

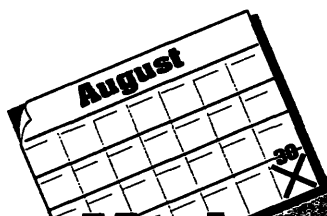


Philippines President Fidel Ramos and Rep. Filner give a thumbs up to better US-Philippines relations.

Filipino counterparts.

But most importantly, he says, he was privileged to meet with countless numbers of Filipino WWII veterans, for whom he is fighting in Congress.

His bill, the Filipino Veterans Equity Act, will restore full equity to these veterans who were conscripted into the Army by President Roosevelt, who fought side-by-side with American soldiers, and who unfairly lost their promised benefits when Congress passed the Rescissions Act in 1946.



Mark your Calendar!

Bob's Birthday is almost here!

It will soon be time for the annual **Filner Birthday Bash!** Plan to join us on **Saturday, August 30th** for a celebration picnic. Watch for your invitation — coming soon.

Bob Filner for Congress
P.O. Box 127868
San Diego, CA 92112
619-425-1998

**ADDRESS CORRECTION REQUESTED
DO NOT FORWARD**



Bulk Rate
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26044150103

EXHIBIT C

26044150109

CONSULTING AGREEMENT

AGREEMENT, dated as of January 2, 1995, between Bob Filner for Congress and Campaign Resources.

WITNESSETH:

WHEREAS, Bob Filner for Congress desires to avail itself of the expertise and fundraising services of Campaign Resources and Campaign Resources desires to make its expertise and fundraising services available to Bob Filner for Congress upon the terms and conditions hereinafter set forth;

NOW, THEREFORE, in consideration of the agreements herein contained, the parties hereto agree as follows:

1. FUNDRAISING SERVICES. Campaign Resources hereby agrees to direct the fundraising program of Bob Filner for Congress. To this end, Campaign Resources agrees to coordinate all fundraising activities, and to identify and assist in contacting prospective contributors to the organization.

2. TERM OF AGREEMENT. The term of this Agreement shall be for the period that shall commence on January 2, 1995, and shall end on January 1, 1997, unless earlier terminated on written notice of the parties under the provisions of Section 9 below or unless extended by written agreement of the parties.

3. CONSIDERATION. As consideration for the services to be provided by Campaign Resources, Bob Filner for Congress agrees to pay to Campaign Resources the following compensation: four thousand dollars (\$4,000) payable monthly. Bob Filner for Congress also agrees to compensate Campaign Resources for all reasonable and necessary expenses such as printing and postage. Bob Filner for Congress agrees to reimburse Campaign Resources for expenses within thirty (30) days of receiving an invoice for expenses from Campaign Resources.

4. CONFIDENTIALITY. Campaign Resources agrees that it, and each of its principals, employees and agents will not, directly or indirectly, at any time during the term of this Agreement or thereafter, and without regard to when or for what reason this Agreement shall terminate, divulge, furnish, make accessible, or permit the disclosure to anyone (other than Bob Filner or any persons employed or designated by Bob Filner) of any knowledge or information of any type whatsoever of a confidential nature relating to the business of Bob Filner for Congress, including business relating to services rendered under this Agreement, or any other entity related thereto unless and only to the extent that such knowledge or information is generally known to the public or the trade (and has become known without the commission of a tortious act by the person disclosing the information) or to the extent it is or shall become available in trade or other publications or in the public record.

5. INDEPENDENT CONTRACTOR. Campaign Resources is retained by Bob Filner for Congress only for the purposes and to the extent set forth herein and Campaign Resource's relationship to Bob Filner for Congress shall, during the period of this Agreement, be that of an independent contractor. Campaign Resources shall not be considered under the provisions of this Agreement or otherwise as being an employee of Bob Filner for Congress.

6. OTHER CONSULTING SERVICES. Campaign Resources and Bob Filner for Congress agree that Campaign Resources may provide independent consulting services to other individuals or entities during the term of this Agreement, provided, however, that:

(i) such other independent consulting services shall in no way impair Campaign Resource's ability to provide consulting services to Bob Filner for Congress pursuant to this Agreement;

(ii) Campaign Resources shall observe in full in relation to consulting work performed for other individuals or entities the confidentiality requirements set forth in Section 4 of this Agreement; and

(iii) Campaign Resources shall avoid at all times activities in the service of other individuals or entities that could present in fact or in appearance a conflict with the interests of Bob Filner for Congress, or any of the candidates that Bob Filner supports for election to any other public office.

7. BREACH OF CONSULTANT. Each party recognizes that the consulting services to be rendered under this Agreement by Campaign Resources are special, and that in the event of breach by Campaign Resources of the terms and conditions of this Agreement to be performed by Campaign Resources, Bob Filner for Congress shall be entitled, if it so elects, to institute and prosecute proceedings in any court of competent jurisdiction, either in law or in equity, to obtain damages for any breach of this Agreement, to obtain an injunction restraining Campaign Resources from committing or continuing any violation of this Agreement, or to enforce the specific performance of this Agreement by Campaign Resources.

8. ASSIGNMENT. Except as specifically set forth in this Agreement, the rights and interests of Campaign Resources in this Agreement may not be sold, transferred, assigned or pledged. The rights and obligations of Bob Filner for Congress hereunder shall be binding upon and run in favor of the successors and assigns of Bob Filner for Congress. In the event of any attempted assignment or transfer of rights hereunder contrary to the provisions hereof, Bob Filner for Congress shall have no further liability for payments hereunder.

9. TERMINATION. Either party may terminate this Agreement at any time by giving the other party written notice thereof at least thirty (30) days prior to the effective date of termination. Upon receiving such notice, Campaign Resources shall not commence work on any new projects, but it shall complete all projects previously approved by Bob Filner for Congress. All other rights and duties, including payment of fees, shall continue during the notice period.

10. WAIVER. Failure of Campaign Resources or Bob Filner for Congress to exercise any right under this Agreement shall not be deemed a waiver of that right or any rights existing hereunder.

11. AMENDMENTS. The foregoing contains the entire Agreement of the parties hereto; however, modifications to this Agreement shall be binding upon the parties when and only if such modification shall be in writing and signed by the respective parties hereto.

12. PRIOR AGREEMENTS. This Agreement supersedes and terminates all prior agreements between the parties relating to the subject matter herein addressed.

13. LAW TO GOVERN. This Agreement shall in all respects be governed under the laws of the District of Columbia.

14. NOTICES. Any notice or other communication required or permitted hereunder shall be in writing and shall be deemed effective when delivered in person or, if mailed, on the date of deposit in the mail, postage prepaid, addressed in the case of Campaign Resources to 408 C Street NE, Washington, DC, 20002, and in the case of Bob Filner for Congress, to it at its offices at P.O. Box 127868, San Diego, CA 92112, or such other address as shall have been specified in writing by either party to the other.

IN WITNESS WHEREOF, Campaign Resources and Bob Filner for Congress each has caused this Agreement to be signed by its duly authorized representative as of the day and year first above written.

Campaign Resources

by Jane Merile Filner

Bob Filner for Congress

by Bob Filner

WISE HODGDON ZEFF
Group

1500 Wilson Blvd., Suite 320
Arlington, Virginia 22209
(703) 516-0103
(703) 516-0110 fax

Memo To: Congressman Bob Filner
From: The Wise Hodgdon & Zeff Group
Re: Fundraising & Computer Services
Date: December 30, 1994

I want to thank you for the opportunity to provide your campaign with this proposal. We believe that the products and services we have developed can be of great benefit to your re-election efforts. This memo responds to your request for an outline of some of the services (including database management and FEC reporting services) that we can provide.

A) Overall Campaign Fundraising

There is no more important component of a political campaign than the fundraising program. Without sufficient funds, there is no opportunity for a candidate to deliver the message he or she wants to convey to the voters.

The fundraising must start early, be well conceived and, ideally, serve as an extension of your individual style. There must be a master plan with specific goals established for different industries, geographic locations and time periods.

This plan should encompass all aspects of a successful Congressional fundraising plan -- i.e., in-district fundraising, Washington, D.C. and Political Action Committee (PAC) events, direct mail and the potential for an on-the-road program. Clearly, because you are new to Congress, the need for prospecting new potential contributors is critical to the success of any program. This plan should also stress the importance and need that all aspects of the fundraising program be inter-related and well-coordinated.

26044150113

Page two

The Wise Hodgdon & Zeff Group can help devise the master plan for a fundraising strategy. This plan will include identification of key individual contributors in the Washington, D.C. community as well as in your home district. The plan will be developed after an analysis of your campaign committee receipt reports, with particular emphasis on PAC participation.

The plan will establish objectives and goals for specific industries with timetables developed for each. Obviously, this will include the development of a finance committee member for each industry and an outline for meet and greets to expand the contributor database.

The success of any fundraising program ultimately will depend on the participation of the candidate. The plan will also include a weekly call list that will be presented to you. Not all of these calls are fundraising calls. In fact, during the early part of 1995, the bulk of these calls may be characterized as "foundation" calls to help build solid, working relationships between you and the key players from each industry. Later, these individuals will act as part of the finance committee to help expand the fundraising base.

Small, but important practices, must be given serious consideration. For example, highly personalized follow-up letters to individuals who you meet in your regular course of business should be prepared in a timely manner. These individuals will be subsequently contacted for participation in some fundraising event. But the initial contact must not be a solicitation letter.

For that portion of the fundraising program based in your district, there must be a close, working relationship between our firm and your office in order to identify some of these key players in the district. We will assist in the follow-up work with these contacts and will help develop a series of meetings in the district based on the finance committee's work at the local level. With many organizations, the key to financial support from the national office is through the local representative of that organization. Relationships with these local representatives must be developed early.

We will also, based on a review of factors which include (but are not limited to) your committee assignments and background, assess the potential for a possible series of events around the country. Similarly, serious consideration must be given to the development of a direct mail fundraising program targeted at small money donors who should be supporting your campaign.

In addition, we will provide an associate who will work closely with you. Our associate will accompany you on specified "meet and greets" in Washington, D.C. and in your district as needed, and be on hand to run fundraising events as they are

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scheduled. If the campaign and our team deem it necessary to place a full time fundraising associate in the district for the final months of the campaign, the specifics of such an arrangement would be subject to a mutual agreement among all parties.

B) Fundraising in Washington, D.C.

Currently, we have on our database approximately 2,000 names and addresses of potential contributors that are primarily based in the Washington, D.C. metropolitan area. These potential contributors represent Washington based lobbyists, corporations, various special interest groups, and organizations with political action committees.

In addition, we track every PAC in the country that has reached a minimal level of contribution history. All entries have been checked for the most current address, phone number, key "money" person and designated by a special industry code based on Department of Labor SIC codes. Key individual contributors, including lobbyists and principal contacts in viable associations in the Washington area have also been included in this database.

Each one of these PAC's can be analyzed for the contribution history it has to other members who serve on the same committees as you, or to other California members, or to other members who enjoy a similar ideological basis as you.

Our firm will handle all aspects of the Washington fundraising program. Included in this service is the development of a Washington-PAC oriented fundraising strategy and a program to cultivate potential contributors. Among the logistical components of a fundraising program that the Wise Hodgdon & Zeff Group can handle are the catering, invitation design, printing, mailings, staffing and collection efforts associated with an individual event.

C) List Maintenance

This is the logical extension of any fundraising program since all contributors and potential contributors have to be tracked. Many campaigns get into trouble by maintaining multiple databases. Updates on one database are rarely made on all other databases.

Our strategy is to utilize only one database from which thank you letters, pledge-prompting letters, letters of invitation and the FEC reports are produced. Other campaign locations needing utilization of this database would be provided with regular updates of the database either via modem, hard disk (3.5) or floppy diskettes (5.25). In this way, all updates, edits and changes to the database are made in one central location.

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We would incorporate the existing database of your campaign into our "master" database for your use. We can also provide some ideas as to how to expand and further enhance the database of prospective contributors - again with the thought that we would be operating with only a single database.

D) FEC Reports

The Wise Hodgdon & Zeff Group currently provides FEC reporting services to a number of Congressional Candidate Campaign Committees. We have developed a computer program to manage campaign reporting with the highest priority placed on compliance with FEC law. Our staff is thoroughly knowledgeable in the area of FEC law and reporting requirements and monitors the new regulations and opinions regularly issued by the Commission.

Again, one of the advantages of utilizing our FEC reporting program is that it becomes extremely cost-effective for our clients through the elimination of duplication of efforts. As indicated above, the master database also serves as the basis of the FEC reporting programs.

Our FEC reporting services allow us to not only prepare your campaign reports with the highest standards of reliability and accuracy, but it also allows us to produce a series of management reports to make the fundraising program more effective. These reports (which are prepared on monthly or quarterly schedules) include the total amount raised, the amounts raised in the district and in Washington, the break-downs by industries or interests, and by event. In this way, continuous analyses of the fundraising program can be conducted and potential fundraising areas can be easily identified.

Equally important, expenditure reports would be prepared which provide a clear picture of where and why money is being spent. Together with the contribution reports, these management reports could provide the basis of a campaign budget, a practice that most candidate committees fail to develop.

The treasurer of the campaign and the depository of campaign funds can remain in the district. Only the reporting and record keeping functions would be conducted in our office. The FEC reports would be prepared by our office and presented for the review and signature of the treasurer.

E. Cost & Expenses

Because there is a marked difference in the type and level of activity between the off-election year and the election year, the

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annual expenses associated with these services are different. The off-year activity is not as frenetic as the election year and is characterized by much more developmental efforts.

Conversely, the election year activity is much more rapidly paced and activities are much more intensely concentrated. Nevertheless, any successful fundraising program must be considered as a two year effort if the maximum fundraising potential is to be realized.

All of the services outlined above can be contracted for separately. Alternatively, there are many campaigns that want to combine the Washington-based fundraising program with the database management and FEC reporting services. Such service packaging can be accommodated within a pricing structure that remains extremely cost-effective. Obviously, there are some economies by contracting for all of the services within one operation.

The monthly fee for 1995 for the complete range of services would be priced at \$4,000 per month. This monthly fee would increase to \$5,000 per month for the 1996 election year. We would, of course, be pleased to provide you with price quotes for any combinations of the all services outlined above.

I hope this addresses some of the questions that you raised. I would be happy to provide greater detail to you on any of the services presented here. Thanks for letting me respond to this opportunity and I look forward to hearing from you at your convenience.

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